

REMARKS

I. Status of Claims

Claims 1-33 are pending in the application. Claims 1-5 and 7-21 are allowed. Claims 6, 22, 27, 28, 32 and 33 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Publication No. 2002/0096925 A1 to Uramichi ("Uramichi"). Claim 31 is rejected under 35 U.S.C. 103(a) as being unpatentable over Uramichi in view of U.S. Patent No. 6,003,945 to Kojima ("Kojima"). Claims 23-26, 29 and 30 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

II. Section 102

Claims 6, 22, 27, 28, 32 and 33 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Publication No. 2002/0096925 A1 to Uramichi. The rejection is respectfully traversed.

Uramichi discloses a seat hinge assembly having a stationary disc 11 and a movable disc 12. Slide pawls 15A-D have teeth 15b that engage ratchet 12c on movable disc 12. A rotating cam 16 has first cam bearing portions 16b that engage a middle bearing portion 15f of slide pawls 15 to drive slide pawls 15 into engagement with ratchet 12c. A working plate 18 has cam grooves 18d that engage cam pins 15e of slide pawls 15 to drive slide pawls 15 out of engagement with ratchet 12c.

Claims 6, 22, 27, and 28

Uramichi fails to disclose or make obvious a reclining vehicle seat hinge assembly including a pair of primary pawls and a pair of secondary pawls, where the **secondary pawls have a construction identical to that of the primary pawls**, as required by independent claim 6.

The Office Action asserts in paragraph 6 on page 5 that:

However, Uramichi plainly states on page 2, paragraph 26 that ‘the slide pawls 15 (15A, 15B, 15C, 15D) are all identical in shape.’ While pawl 5A may have a different function and a cam pin that is longer than other pawls, the pawls 15A-15D themselves all have an identical construction.

Applicants respectfully point out that this language is an incomplete citation. The complete citation reads as follows: “**Main constitutional parts** of the slide pawls 15(15A, 15B, 15C, 15D) are all identical in shape.” (page 2, paragraph 26; emphasis added). The specification of Uramichi goes on to describe that “a cam pin 15e... **is formed in the pawl body 15a**...[and] that the cam pin 15e of the slide pawl 15A is formed to be **slightly longer** than those of the other slide pawls 15.” (page 2, paragraph 27; emphasis added.) The Office Action even acknowledges this difference. Specifically, the Office Action states that “[w]hile pawl 15A may have a different function and a cam pin that is longer than the other pawls, the pawls 15A-15D themselves have an identical construction.” Although the first portion of this statement is correct, the second portion is not.

The cam pins 15e are part of the pawls. As noted above, cam pin 15e is formed in the pawl body 15a. It is not a separate element. It is a portion of the pawl. That is why it has a corresponding number. Each part of the pawl has the number 15 followed by a small case letter (a-f) designating a particular portion of the pawl.

It cannot be correctly argued that the pawls are identical while at the same time acknowledging that one part of one of the pawls is different from that corresponding part on the other pawls. If, as argued in the Office Action, cam pins 15e should not be considered part of the pawls, then slide pawl bodies 15a, outer teeth 15b, right leg portions 15c, left leg portions 15d, and middle bearing portion 15f also should not be considered part of pawls 15. Such a proposition would render pawls 15 empty and without structure! This simply cannot be. If pawls 15A-D were identical, their entire construction would be identical; not just some or most of the pawls, or their

main constitutional parts.

By design Uramichi **expressly recites** that the pawls 15A-D are not identical. The purpose behind the difference clearly explains why they are different. Cam pin 15e of slide pawl 15A serves as the only cam pin connected with unlock plate 19, such that operation of unlock plate 19 requires this different cam pin. Not only is slide pawl 15A not identical to the other pawls, it would not function properly if it were identical to the others.

Consequently the limitation of identical pawls is **not found** in Uramichi, and identical slide pawls would not even be obvious in view of Uramichi, since identical pawls would defeat the purpose of the longer cam pin 15e of slide pawl 15A of Uramichi.

Claims 32, and 33

Uramichi fails to disclose or make obvious a reclining vehicle seat hinge assembly including a pair of secondary pawls configured to be driven radially outward with respect to the first housing upon engagement with a corresponding camming surface of a secondary cam, as required by independent claim 32.

Each of the pawls 15A-D of Uramichi is driven radially outward upon engagement with the primary cam of Uramichi, namely rotating cam 16. The secondary cam of Uramichi, namely working plate 18, drives each of pawls 15A-D **radially inward** and out of engagement with ratchet 12c.

Specifically at page 4, paragraph 41, Uramichi discloses that bearing cam portions 16b of rotating cam 16 abut middle bearing portions 15f of slide pawls 15A-D, causing slide pawls 15A-D to mesh with ratchet 12c. Additionally, at page 4, paragraph 43, Uramichi discloses that “working plate 18 radially inwardly presses the cam pin 15e of each of the slide pawls 15 ... causing slide of

the slide pawl... bringing the slide pawls 15 out of mesh with the ratchet 12C.”

Thus it is clear that rotating cam 16 (the primary cam) moves slide pawls 15A-D radially outward into engagement with ratchet 12C and working plate 18 (the secondary cam) moves slide pawls 15A-D radially inward out of engagement with ratchet 12C.

Accordingly, this required limitation is not found in Uramichi, and the rejection is improper and should be withdrawn.

III. Section 103

Claim 31 is rejected under 35 U.S.C. 103(a) as being unpatentable over Uramichi in view of Kojima. Kojima is recited as disclosing a cooperating washer. This rejection is respectfully traversed.

Kojima fails to overcome the deficiencies of Uramichi discussed above. Specifically, Kojima fails to disclose or make obvious a reclining vehicle seat hinge assembly including a pair of primary pawls and a pair of secondary pawls, where the secondary pawls have a construction identical to that of the primary pawls, as required by independent claim 6, from which claim 31 depends.

Accordingly, the rejection is improper and should be withdrawn.

III. Allowable Claims

Claims 23-26, 29 and 30 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Since claim 6, from which claims 23-26, 29 and 30 depend, is believed to be allowable, as discussed above, claims 23-26, 29 and 30 are believed to be allowable in their present form. Accordingly, the objection should be withdrawn.

IV. Conclusion

Pending claims 1-33 are believed to be in form for allowance, and an indication to that effect is respectfully requested at this time. Please apply any charges or credits to Deposit Account No. 19-0733.

Respectfully submitted,

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